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Turner Staffing Group, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WADE ALLEN, individually, and on behalf of
all others similarly situated,

Plaintiff,

vs.

BARRICK GOLD OF NORTH AMERICA,
INC. d/b/a NEVADA GOLD MINES LLC; and
TURNER STAFFING GROUP, LLC,

Defendants.

Case No.: 3:24-cv-00231-CLB

**ORDER GRANTING STIPULATION
EXTENDING TIME FOR ALL
DEFENDANTS TO RESPOND TO
PLAINTIFF'S COMPLAINT (ECF
No. 1)**

(THIRD REQUEST)

Defendant TURNER STAFFING GROUP, LLC ("Turner" Or "Defendant"), by and through its counsel of record, the law firm of Jackson Lewis P.C., Defendant NEVADA GOLD MINES, LLC (erroneously sued as Barrick Gold of North America, Inc d/b/a Nevada Gold Mines, LLC), by and through their counsel, by and through their counsel of record, the law firm of Simons Hall Johnston PC ("NGM"), and Plaintiff WADE ALLEN ("Plaintiff"), by and through his counsel of record, the law firms of Brown, LLC and Roger Wenthe, PLLC, hereby stipulate and agree to extend the time for Defendants Turner and NGM to file their respective responses to Plaintiff's Complaint (ECF No. 1) up to and including **September 13, 2024** based on the following:

1. On July 8, 2024, Plaintiff and Turner stipulated to extend Turner's time to respond to Plaintiff's Complaint to July 19, 2024 (First Request) (ECF No. 8), which the Court granted on July 9, 2024. ECF No. 9.

2. On July 16, 2024, Plaintiff and NGM stipulated to extend NGM's time to respond to Plaintiff's Complaint to July 31, 2024 (First Request) (ECF No. 12), which the Court granted on

1 July 17, 2024. ECF No. 14.

2 3. On July 24, 2024, the Parties stipulated to extend the time for all Defendants to
3 respond to Plaintiff's Complaint to August 26, 2024 (Second Request) (ECF No. 15), which the
4 Court granted that same day. ECF No. 16.

5 4. The Parties are continuing to explore whether it may be possible to resolve this case
6 without continued litigation. One issue that the Parties are working through is the availability of
7 certain time-and-pay related information from a non-party to this case.

8 5. To appropriately focus their respective efforts and resources, the Parties have agreed
9 to further extend the time for Defendants to file their respective responses to Plaintiff's Complaint
10 to September 13, 2024.

11 6. This is the third stipulation to extend the time for Turner and NGM to respond to
12 Plaintiff's Complaint.

13 7. The Parties are working together in good faith and believe these circumstances
14 constitute good cause for extending Defendants' time to respond to the Complaint. *See* Fed. R. Civ.
15 P. 6(b)(1).

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8. The Parties are not waiving, relinquishing, or otherwise impairing any claim, defense, argument, or other right they may have by virtue of entering into this Stipulation. *See Szanto v. Marina Marketplace 1, LLC*, No. 3:11-cv-00394-RCJ-VPC, 2013 U.S. Dist. LEXIS 168028, at *10 (D. Nev. Nov. 26, 2013).

DATED this 26th day of August, 2024.

BROWN, LLC

JACKSON LEWIS P.C.

/s/ Nicholas Conlon

/s/ Joshua A. Sliker

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Nevada Gold Mines

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: August 27, 2024